

ORIGINAL

U.S.D.C. Atlanta

IN THE UNITED STATES DISTRICT COURT  
 FOR THE NORTHERN DISTRICT OF GEORGIA  
 ATLANTA DIVISION

ERNEST MILLER,	)
	)
Plaintiff,	)
	) Civil Action File No.:
v.	) 1:02-CV-0773-CC
	)
UNIVERSAL WRESTLING	)
CORPORATION f/k/a	)
WORLD CHAMPIONSHIP WRESTLING,	)
INC., TURNER SPORTS, INC.,	)
TURNER ENTERTAINMENT GROUP,	)
INC. and TURNER BROADCASTING	)
SYSTEM, INC.,	)
	)
Defendants.	)
	)

APR -3 2003  
 LUTHER D. THOMAS, Clerk  
 By: *Choucher*  
 Deputy Clerk

JOINT MOTION TO EXTEND DISCOVERY

COME NOW Plaintiff Ernest Miller and Defendants Universal Wrestling Corporation (f/k/a World Championship Wrestling, Inc.), Turner Sports, Inc., Turner Entertainment Group, Inc., and Turner Broadcasting System, Inc. and show this Court that they jointly agree that the parties need a reasonable extension of the discovery period to properly complete discovery in this action if the parties do not resolve this case through mediation.

The parties specifically show the Court the following:

1.

The discovery period was scheduled to expire on March 24, 2003.

2.

Prior to the expiration of the discovery period, the undersigned informed the Court that the parties have agreed to mediate this case along with all related cases.

3.

Counsel for the parties to this action also represent parties in the following related cases (the "Related Cases"):

Davis v. World Championship Wrestling, Inc. and Turner Sports, Inc., Civ. File No. 1:00-CV-1716-CC;  
Saengsiphon v. World Championship Wrestling, Inc. and Turner Sports, Inc., Civ. File No. 1:00-CV-1719-CC;  
Speight v. World Championship Wrestling, Inc. and Turner Sports, Inc., Civ. File No. 1:00-CV-1718-CC;  
Worthen v. World Championship Wrestling, Inc. and Turner Sports, Inc., Civ. File No. 1:00-CV-1717-CC;  
Reeves v. World Championship Wrestling, Inc. and Turner Sports, Inc., Civ. File No. 1:00-CV-1720-CC;  
Easterling v. World Championship Wrestling, Inc. and Turner Sports, Inc., Civ. File No. 1:00-CV-1715-CC  
Onoo v. World Championship Wrestling, Inc., Turner Sports, Inc., Civ. File No. 1:00-CV-0368-CC  
Norris v. World Championship Wrestling, Inc., Turner Sports, Inc., Civ. File No. 1:00-CV-0369-CC  
Walker v. World Championship Wrestling, Inc., Turner Sports, Inc., Civ. File No. 1:00-CV-0367-CC;  
Patterson v. World Championship Wrestling, Inc., Turner Sports, Inc., Turner Entertainment Group, Inc., Civ. File No. Civ. File No. 1:01-CV-1152-CC.  
Huffman v. World Championship Wrestling, Inc., Turner Sports, Inc., Turner Entertainment Group, Inc., Civ. File No. 1:02-CV-1637CC

4.

Pursuant to the Magistrate's Scheduling Orders, Defendants have filed motions for summary judgment as to all of the related

cases except Huffman. Each Plaintiff has filed a Response, and Defendants have filed Reply briefs in each case as well.

5.

Although the parties have agreed to mediate this case and the Related cases, the parties acknowledge that they will need to conduct limited additional discovery should the parties not resolve the case through mediation.

6.

Accordingly, the parties specifically request this Court to issue an Order such that the parties are permitted up to and including May 30, 2003 to complete discovery in this case, if necessary. A proposed Order is attached hereto as Exhibit "A."

Respectfully submitted, this 3d day of April, 2003.

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Cary Ichter  
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Charles J. Gernazian  
Georgia Bar No.: 291703  
Michelle M. Rothenberg-Williams  
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Eric Richardson by cjc w/ express permission  
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Attorneys for Defendants



## EXHIBIT / ATTACHMENT

A handwritten signature consisting of the letters "A" and "T" written over a horizontal line.

(To be scanned in place of tab)

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FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

ERNEST MILLER, )  
                  )  
Plaintiff,      )  
                  ) Civil Action File No.:  
v.                ) 1:02-CV-0773-CC  
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UNIVERSAL WRESTLING     )  
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WORLD CHAMPIONSHIP WRESTLING, )  
INC., TURNER SPORTS, INC., )  
TURNER ENTERTAINMENT GROUP, )  
INC. and TURNER BROADCASTING )  
SYSTEM, INC.,        )  
                  )  
Defendants.      )  
                  )

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ORDER

It appearing to the Court that the parties have jointly moved for a reasonable extension of the discovery period in this action, and for good cause shown, IT IS HEREBY ORDERED that this Court's Scheduling Order is amended so that the time within which the parties may complete discovery in the above-captioned case is extended through and including May 30, 2003, and that all additional and related deadlines set out by the Court's Scheduling Order are similarly extended.

It is further Ordered that the parties shall report to the Court, no later than May 30, 2003, as to whether they have

resolved the above-captioned case through mediation.

SO ORDERED, this \_\_\_\_\_ day of \_\_\_\_\_, 2003.

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JUDGE, U.S. DISTRICT COURT

CERTIFICATE OF SERVICE

This is to certify that I have this date served opposing counsel to this action with the foregoing **JOINT MOTION TO EXTEND DISCOVERY** by depositing a copy of the same in the United States Mail with adequate postage, addressed as follows:

Eric Richardson  
Evan Pontz  
Troutman Sanders LLP  
Suite 5200, Bank of America Plaza  
600 Peachtree Street, N.E.  
Atlanta, Georgia 30308-22165

This 3<sup>rd</sup> day of April, 2003.

  
\_\_\_\_\_  
Charles J. Gernazian  
Georgia Bar No.: 291703